

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

VS.

**ABDUL NAUSHAD
WAJIHA NAUSHAD**

Defendants.

Case No. 4:19CR591 ERW/NAB

**DEFENDANTS' UNOPPOSED JOINT MOTION FOR
EXPEDITED PERMISSION TO TRAVEL TO PAKISTAN**

Come Defendants Dr. Abdul Naushad and his wife Wajiha Naushad, through their respective counsel, and move the Court to modify their conditions of release to allow them to travel to Pakistan from May 14-31, 2021 to plan and host their son's wedding in Lahore, Pakistan. As a condition of their bond Naushads had to surrender their passports to United States Probation Office. For their travel to Pakistan Naushad's need their passports which are believed to have expired in 2020. If their travel is approved by the Court, they would need to retrieve and renew their passports and obtain any necessary visas for Pakistan. These tasks will take at least three to four weeks, hence their request for expedited action.

Undersigned have discussed the motion with Assistant United States Attorney Dorothy L. McMurtry, and she does not object.

Respectfully submitted,

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/s/ J. Alex Little (w/permission)
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Attorney for Defendant Abdul Naushad

CERTIFICATE OF SERVICE

I hereby certify that on April 12, 2021, I electronically filed with the Clerk of the Court using the CM/ECF system upon:

Dorothy L. McMurtry
U.S. Department of Justice
Office of U.S. Attorney
111 S. Tenth Street, 20th Floor
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/s/ Khalid A. Kahloon